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October 7, 2016

Via ECF

Honorable Sarah Netburn  
Thurgood Marshall Courthouse  
United States District Court

Re: *Coordinated RMBS Trustee Actions Against HSBC Bank USA, N.A.*, Nos. 14-cv-08175; 14-cv-09366; 14-cv-10101; 15-cv-02144; 15-cv-10032; 15-cv-10096

Dear Judge Netburn:

We write on behalf of Defendant HSBC Bank USA, N.A. ("HSBC") in response to Plaintiffs' letter dated October 5, 2016 regarding the coordination of statistical sampling expert discovery in these actions.

Plaintiffs have requested an extension (from the current deadline of October 5 until October 10) to provide HSBC with their proposed sample, methodology, and loan file reunderwriting protocol. Plaintiffs state that they need additional time to work with their expert before submitting their protocol. HSBC does not object to Plaintiffs' requested extension. However, should the Court grant Plaintiffs' request, HSBC requests a corresponding extension (from the current deadline of October 14 until October 19) for the parties to submit their joint or separate proposals to the Court.

This modest extension will allow HSBC an opportunity to consult with its experts, assess the feasibility and burden of Plaintiffs' proposal, meet and confer with Plaintiffs, and, if necessary, formulate its own proposal for the Court's consideration. We respectfully submit that without a corresponding extension for HSBC, allowing a mere four days to accomplish these steps before a proposal is due to the Court would prejudice HSBC and hinder efforts in these actions to satisfactorily plan for this aspect of expert discovery. HSBC further submits that if the Court chooses to conduct a conference on this issue, it should schedule the conference after October 19.

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Respectfully submitted,

*/s/ Kevin M. Hodges*

Kevin M. Hodges

cc: Counsel for all parties via ECF